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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BRITNEY GOOCH, individually; and  
THOMAS IMPASTATO, individually,

Plaintiffs,

vs.

LAS VEGAS BISTRO, LLC dba LARRY  
FLYNT'S HUSTLER CLUB, a Nevada  
limited liability company; DOES I-X; and  
ROE BUSINESS ENTITIES I-X, inclusive,

Defendants.

Case No. 2:14-cv-02189-APG-PAL

**MOTION TO EXTEND DISPOSITIVE  
MOTION DEADLINE  
(THIRD REQUEST)**

Pursuant to LR 6-1, 6-2, and LR 26-4, the Defendant, by and through counsel of record, hereby request that this Court extend the dispositive motion deadline in the above-captioned case by seven (3) days, up to and including June 27, 2016. In support of this Motion, Defendant states as follows:

**PRIOR EXTENSIONS:**

1. On March 30, 2016, the Court entered the parties' Stipulation and Order to Extend Discovery Deadlines (First Request), which extended the discovery and dispositive motion deadline by 30 days. Dkt. No. 39.

2. On June 20, 2016, the Court entered the parties' Stipulation and Order to Extend Dispositive Motion Deadline (Second Request), which extended dispositive motion deadline by 7 days. Dkt. No. 41.

3. The current dispositive motion deadline is June 24, 2016.

**REASONS FOR REQUEST**

4. Undersigned counsel for Defendant, Matthew J. Hoffer, has worked diligently toward filing Defendant's motion for summary judgment within the current deadline. However, counsel released his support staff for the weekend and is struggling to assemble the Motion, Memorandum, and supporting documents in an acceptable fashion. Counsel wishes to assemble the documents in an orderly fashion for the Court.

5. The requested extension, will, if ultimately necessary, allow counsel support staff to assist in finalizing the motion. Nevertheless counsel will labor to file the motion as soon as possible.

6. In addition, Counsel for Defendant will seek consent in the present Motion so that it may be entered as unopposed pursuant to LR IA 6-2

The following is a list of the current discovery deadlines and the parties' proposed extended Deadlines:

Event	Current Deadline	Proposed Deadline
Dispositive Motions	June 24, 2016	June 27, 2016
Joint Pretrial Order	July 25, 2016, or at least thirty (30) days after the decision on	July 28, 2016, or at least thirty (30) days after the decision on

	the last dispositive motion.	the last dispositive motion.
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WHEREFORE, the Defendant respectfully requests that this Court extend the current dispositive motion deadline by three (3) days from the current deadline of June 24, 2016, up to and including June 27, 2016.

DATED this 24th day of June, 2016.

**JACKSON LEWIS P.C.**

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*Attorneys for Defendant Las Vegas Bistro,  
LLC dba Larry Flynt's Hustler Club*

DATED this 15th day of June, 2016.

**SHAFFER & ASSOCIATES, P.C.**

/s/ Matthew J. Hoffer

MATTHEW J. HOFFER, ESQ.

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*Attorneys for Defendant Las Vegas Bistro,  
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**ORDER**

**IT IS SO ORDERED.**

DATED this 29 day of June, 2016.



U.S. District Court Judge / Magistrate Judge